

BRIGID M. HIGGINS, NV Bar No. 5990
BLACK & WADHAMS, Attorneys at Law
10777 West Twain Avenue, Suite 300
Las Vegas, Nevada 89135
Telephone: 702-869-8801
Fax: 702-869-2669
Email: bhiggins@blackwadhams.law

Attorneys for Plaintiff Avocado Oil de Mexico, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

AVOCADO OIL DE MEXICO, INC.,

Plaintiff,

v.

ALKO GREEN FRESH LLC, and JORGE A.
ORTEGA MEDINA,

Defendants.

CASE NO.: 2:21—cv-00946-RFB-BNW

**ORDER FOR JUDGMENT DEBTOR
EXAMINATION OF THE PERSON
MOST KNOWLEDGEABLE OF ALKO
GREEN FRESH, LLC**

It appearing to the Court, by the Petition of Plaintiff, Avocado Oil De Mexico, Inc., in the above-entitled matter, that a Stipulated Judgment was recovered in said action against Defendant, Alko Green Fresh, LLC, on September 15, 2021, in the sum of \$74,012.00, plus interest accrued at the rate of 18% annually of \$6,298.84 through June 15, 2021, and accruing thereafter at in the amount of \$36.50 per day, together with attorney's fees and costs in the sum of \$11,582.73, that one payment of \$3,083.33 was made on the Stipulated Judgment and no payments were made thereafter, that a balance of \$103,446.74 remains on the Stipulated Judgment. Defendant having defaulted under the terms of the Stipulated Judgment, and whereas Federal Rule of Civil Procedure 69 and NRS 21.270 provides for the examination of judgment debtors under such circumstances:

IT IS HEREBY ORDERED that the person most knowlesgeable related to the assets of Alko Green Fresh. LLC and the documents listed on Exhibit A hereto **appear on the 15TH day of September, 2022, at the hour of 1:30 p.m., at the law office of BLACK & WADHAMS, located at 10777 W. Twain Ave., Suite 300, Las Vegas, Nevada 89135,** or through other electronic means, and on such

1 further days as I shall name, to make discovery under oath before a notary public, or some other officer
2 authorized by law to administer oaths, concerning Defendant Alko Green Fresh, LLC's property,
3 interests or assets.

4 IT IS FURTHER ORDERED that said person most knowledgeable of Defendant Alko Green
5 Fresh, LLC bring to said hearing the documents set forth in Exhibit "A" attached hereto and incorporated
6 herein by this reference.

7 IT IS FURTHER ORDERED that a copy of this Order, together with a copy of the Notice of
8 Judgment Debtor's Exam, be forthwith served on said Defendant Alko Green Fresh, LLC or on his
9 attorney or registered agent of the State of Nevada, in the manner provided by law for service of
10 Summons.

11 Failure to appear at the time and place stated above may be punishable for contempt by the Judge.
12 IT IS FURTHER ORDERED that ECF No. 19 Plaintiff's Motion for Judgment Debtor Exam is
13 GRANTED.

14 IT IS SO ORDERED this 11th day of August, 2022.

15 
UNITED STATES MAGISTRATE JUDGE

16 Submitted by:

17 BLACK & WADHAMS

18
19 By: 

20 Brigid M. Higgins, Esq.
21 Nevada Bar No: 5990
22 10777 W. Twain Ave., Suite 300
23 Las Vegas, NV 89135
24 Telephone: (702) 869-8801
25 Facsimile: (702) 869-2669
26 Attorneys for Plaintiff/Petitioner
27 *Avocado Oil De Mexico, Inc.*
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EXHIBIT A

1. Bank statements on all checking accounts and/or savings accounts, corporate certificates of deposit or in which the Judgment Debtor Alko has any interest whatsoever either alone or jointly with any other person or persons from the period of January 1, 2021 to the present.
2. All canceled checks written upon any account stated in Paragraph 1 above.
3. All savings deposit books covering any accounts stated in Paragraph 12 above.
4. Statements covering any savings accounts held in savings or loan associations or similar associations belonging to the Judgment Debtor Alko or in which you have or have had any interest whatsoever either alone or jointly with any other person or persons from the period of January 1, 2021 to the present.
5. All savings deposit books covering any accounts in paragraph 4 above.
6. Key to any and all safe deposit boxes whether privately maintained or in any bank or savings and loan or similar association belonging to you or in which you have or have had an interest whatsoever either alone or jointly with any other person or persons for one year preceding the date of this order and all documents relating to that safe deposit box.
7. Any and all documents relating to real property including, but not limited to, deeds of trust, mortgages, deeds, leases, contracts, or other papers reflecting an interest in real property held by the Judgment Debtor Alko.
8. Conveyances or transfers of any real or personal property by Judgment Debtor Alko to a trust or any third party from January 1, 2020 to present.
9. Financial statements of the Judgment Debtor Alko from January 1, 2021 to the present.
10. Any and all documents including, but not limited to, promissory notes or contracts, which reflect any money owed to the Judgment Debtor Alko.

- 1 11. All correspondence from collection agencies and attorneys.
- 2 12. All insurance policies.
- 3
- 4 13. All state and federal income tax and any other tax returns filed by Judgment Debtor Alko for
- 5 tax years 2020, to the present, including all exhibits, schedules, forms, and other documents
- 6 referenced in or attached to Judgment Debtor Medina's tax returns.
- 7
- 8 14. All documents that constitute or relate to any and all books, records, ledgers, income statements,
- 9 balance sheets, check registers, or other memoranda of business or financial conduct, activities,
- 10 status, or income of Judgment Debtor Alko from January 1, 2020, to the present.
- 11
- 12 15. All deeds, records, or other documents that identify or relate to real property in which Judgment
- 13 Debtor Alko currently owns or claims an interest or did own or claim an interest from January
- 14 1, 2020, to the present.
- 15
- 16 16. All documents that identify or relate to any items of personal property in which Judgment Debtor
- 17 Alko currently owns or claims an interest with a value (or, if actual value is unknown, with a
- 18 believed value) of \$500 or more.
- 19
- 20 17. All documents, items, and things that refer in any way, directly or indirectly, to any and all
- 21 accounts (business or personal bank, checking, savings, credit union, or retirement) in which
- 22 Judgment Debtor Alko has an interest, including monthly statements (or other period if issued
- 23 less frequently) from January 1, 2020, to the present.
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- 25 18. A list, prepared specifically for the purpose of responding to this Order, identifying the names
- 26 and addresses of persons who have served as bookkeepers, accountants, or financial advisers for
- 27 Judgment Debtor Alko from January 1, 2020, to present.
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19. All documents that refer in any way, directly or indirectly, to the identity of any person or entity
- to whom Judgment Debtor Alko has paid, given, or conveyed any real or personal property with
- a value more than \$500, not in the regular course of business, from January 1, 2020, to present.

20. All documents that refer in any way, directly or indirectly, to the identity of any person or entity to whom Judgment Debtor Alko has made a charitable contribution/donation, tithe, offering, gift, or other donation in the amount of \$500 or more from January 1, 2020, to present.
21. All documents that refer in any way, directly or indirectly, to any and all motorized vehicles (including automobiles, trucks, watercraft, aircraft, recreational vehicles, and motorcycles) in which Judgment Debtor Alko owns or claims an interest.
22. All documents that constitute or refer in any way, directly or indirectly, to any appraisal of any real or personal property prepared for Judgment Debtor Alko or that otherwise reflect the value of any real or personal property in which Judgment Debtor Alko has or claims an interest.
23. All documents that evidence or refer in any way, directly or indirectly, to the amount of money owed to Judgment Debtor Alko by any person or entity.
24. All documents that refer in any way, directly or indirectly, to any legal cause of action, either real or anticipated, by or against Judgment Debtor Alko, other than the underlying case commenced in the United States District Court for the District of Nevada, (Case No. 2:21-cv-00946-RFB-BNW) or any other lawsuit that references the incident referred to in this litigation, including and not limited to any declaratory relief or other action by a carrier of insurance to determine coverage.
25. All documents that refer in any way, directly or indirectly, to the anticipated amount of recovery in any legal cause of action, either real or anticipated, by Judgment Debtor Alko.
26. All documents that refer in any way, directly or indirectly, to any cash on hand for Judgment Debtor Alko as of (a) the date Judgment Debtor Alko first received notice of any kind of this Order, and (b) the day before the Judgment Debtor Alko's examination as ordered herein.
27. All documents that identify any accounts receivable owed to Judgment Debtor Alko.
28. All documents that identify any notes receivable held by Judgment Debtor Alko or in which Judgment Debtor Alko claims any interest.

1 29. All documents that identify any stocks, bonds, mutual funds, certificates of deposit, or any other
2 investment owned by Judgment Debtor Alko or in which Judgment Debtor Alko claims any
3 interest.

4 30. All documents that identify any interest Judgment Debtor Alko has or claims in any business,
5 partnership (limited or general), corporation, limited liability company, limited liability
6 partnership, or joint venture (collectively, the "Business Records").
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8 31. The Articles of Organization, Operating Agreement, meeting minutes, resolutions of Judgment
9 Debtor Alko.
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